

# EXHIBIT F

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

VICTORIO BUTTO,  
LAKESHA HOUSER, on behalf of  
themselves and all others  
similarly situated,

Plaintiff,

No. 2:10-cv-02906-ADS-AKT

v.

COLLECTO, INC. D/B/A EOS/CCA,

Defendant.

**SUPPLEMENTAL RESPONSES TO PLAINTIFF'S FIRST SET OF  
INTERROGATORIES TO DEFENDANT**

Defendant makes the following supplemental responses to the following interrogatories as agreed by the parties:

**INTERROGATORIES**

**Interrogatory No. 3:**

Identify each of your employees responsible for oversight of consumer collections.

**RESPONSE:**

John Burns, VP Corporate Services, 700 Longwater Drive, Norwell, MA 02061

**Interrogatory No. 8:**

Set forth with specificity the manner in which you acquired the Plaintiffs' debts or accounts.

**RESPONSE:**

AT&T placed an account of Plaintiff Houser for collection by the transmission of certain electronic data on February 9, 2010 and another account on August 31,

2010. Verizon placed an account of Plaintiff Butto for collection by the transmission of certain electronic data to defendant on February 3, 2010.

Interrogatory No. 10:

Set forth the number of persons in the state of New York to whom you sent a Letter which included a Collection Fee within the relevant time period.

RESPONSE:

In the one year period immediately preceding the date of the filing of the Complaint, Collecto sent one or more letters to 46,897 AT&T customers, and to 18,949 Verizon customers that would have included an amount attributable to a collection fee being charged by the creditor.

Interrogatory No. 12:

Describe with specificity the manner in which the Collection Fees in the Butto and Houser Letters were calculated.

RESPONSE:

The collection fees disclosed to plaintiffs Houser and Butto were calculated based on a percentage of the underlying debt as prescribed by the plaintiffs' creditors. In each case, that amount was 18%.

Interrogatory No. 13:

Describe with specificity the manner in which Collection Fees are calculated or determined.

RESPONSE:

Collection fees for Verizon or AT&T customers are calculated as prescribed by Verizon and AT&T.

Interrogatory No. 14:

For each person identified in your response to Interrogatory number 11, set forth the total Collection Fee recovered by Collecto.

RESPONSE:

In the one year period next preceding the filing of the Complaint in this action, defendant collected, in the aggregate, the following amounts of collection fees: For Verizon accounts, \$14,986.84; for AT&T accounts, \$127,600.43.

Interrogatory No. 19:

State whether Collecto's net worth is equal to or exceeds \$50,000,000.00. If not, set forth the description and value of each of each of Collecto's assets and liabilities.

RESPONSE:

No. See audited balance sheet.

Date: April 27, 2012

THE DEFENDANT  
COLLECTO, INC. d/b/a EOS/CCA

By:   
Jonathan D. Elliot (ct05762)

Zeldes, Needle & Cooper, P.C.  
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Bridgeport, CT 06604  
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Its Attorneys

VERIFICATION

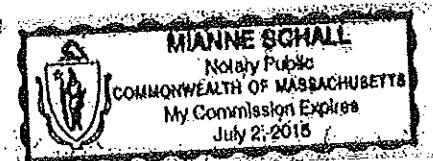
THIS IS TO CERTIFY THAT I, John F. Burns Jr., on behalf of the Defendant EOS CCA ("the Defendant"), have read the foregoing responses to Plaintiff's First Set of Interrogatories and state that they are true and accurate to the best of my knowledge, on this 25<sup>th</sup> day of April, 2012.

By: John F. Burns Jr.  
Its Vice President Corporate Services

On the 25<sup>th</sup> day of April, 2012, personally appeared John F. Burns Jr. on behalf of the Defendant, who affirmed under oath the truth of the foregoing responses to interrogatories.

Maureen Schall  
Notary Public

My Commission Expires:

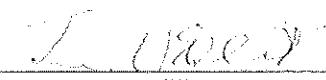


CERTIFICATION

This is to certify that a copy of the foregoing has been sent via U.S. First Class Mail, postage prepaid, on this date, to:

Sergei Lemberg, Esq.  
Lemberg & Associates, LLC  
1100 Summer St., Floor 3  
Stamford, CT 06905

Dated at Bridgeport, Connecticut on this 11th day of April 2012.

  
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Jonathan D. Elliot